

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALASKA VILLAGE ELECTRIC
COOPERATIVE, INC., an Alaska
corporation,

Plaintiff,

v.

ZURICH AMERICAN INSURANCE
COMPANY, a New York corporation;
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
THROUGH CHARTIS GLOBAL MARINE,
a Pennsylvania corporation; NATIONAL
CASUALTY COMPANY, a Wisconsin
corporation; GREAT AMERICAN
INSURANCE COMPANY OF NEW YORK,
a New York corporation; and STARR
INDEMNITY & LIABILITY COMPANY, a
Texas corporation,

Defendants.

IN ADMIRALTY AND AT LAW

Lead Case No. 2:11-cv-01375-RAJ

Member Case No. 2:11-cv-01819-RAJ

DECLARATION OF JOHN ORDON

NOTE ON MOTION CALENDAR:
August 1, 2014

I, John Ordon, declare as follows:

1. I am an Assistant Vice President and Regional Claims Manager for Starr Adjustment Services, Inc. Starr Adjustment Services is a Starr Insurance affiliate, which manages claims asserted against Starr's coverages.

2. The AVEC/Vitus Marine claim has been assigned to me since the claim was first raised in May or June of 2012.

DECLARATION OF JOHN ORDON: Lead Case
No. 2:11-cv-01375 - 1

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1 3. I was requested to ascertain whether the firm of Bauer Moynihan & Johnson
2 represents Starr. From my personal review of the claims files maintained here in our San
3 Francisco offices, I have determined that Bauer Moynihan & Johnson is acting as coverage
4 counsel for Starr Indemnity & Liability on a case involving our insured, the Port of
5 Bellingham. There is a dispute concerning whether the Port of Bellingham was obliged to
6 provide insurance coverages to the State of Alaska. Mr. Jim Bauer is personally functioning
7 as coverage counsel to Starr Indemnity on the matter. We have retained another firm of
8 lawyers as defense counsel.

9 4. There are multiple other Starr claims offices around the country. I do not know
10 whether any of those may be working with Mr. Bauer's firm as Starr's counsel.

11 I declare under penalty of perjury under the laws of the State of Washington that the
12 foregoing declaration is true and correct.

13 Dated this 10th day of July, 2014.

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16 John Ordon
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DECLARATION OF JOHN ORDON: Lead Case
No. 2:11-cv-01375 - 2

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2014, I caused to be served the foregoing DECLARATION OF JOHN ORDON on the following parties via United States District Court – Western District of Washington’s Electronic Case Filing System (“ECF”) at the following addresses:

- **Claire L. Rootjes**
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By: /s/ Claire L. Rootjes
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Attorneys for Defendants
Zurich American Insurance Company,
National Union Fire Insurance Company
of Pittsburgh, PA, through Chartis
Global Marine, National Casualty
Company, Great American Insurance
Company of New York, and Starr
Indemnity & Liability Company

CERTIFICATE OF SERVICE - 1

CASE NO. 2:11-CV-01375-RAJ AND CASE NO. 2:11-CV-01819-RAJ

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